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May 23, 2024

Via CEC Docket 24-BSTD-01

Commissioner Andrew McAllister
California Energy Commission
1516 Ninth Street, MS-39
Sacramento, CA 95814

RE: CalCERTS Fifth Set of Comments: QA on Associated Lots

California Energy Commission Staff have worked with industry stakeholders and HERS Providers to clarify the Quality Assurance (QA) requirements for inspections of homes that pass compliance via sampling.

CalCERTS supports a language change to require QA of associated lots on a 1 per 100 ratio rather than based on sample groups, triggered at the 7th group. A language change to 1 per 100 ratio is more predictable and reasonable. This in turn allows ECC Providers to better budget and schedule staff resources.

CalCERTS also supports a move from requiring QA of associated lots tied to a specific tested lot of a Rater, to simply requiring QA of a certain percentage of associated lots for each Developer. This change allows ECC Providers better flexibility with timing and logistics to ensure the Provider gathers enough QA data and information for the CEC on the efficacy of sampling but also does not impede the Builders' or Raters' ability to complete their work. The timing of how sampling is completed, and sample groups are compiled, does not comport well with how the regulations are currently drafted. (See TN 256030)

The new mandate to QA specific Developers utilizing sampling is a new cost and criteria of the Field Verification and Diagnostic Testing Program. Adopting the Developer mandate for the 2025 code will provide the CEC with information and data that will be useful. Any more restrictive requirements, if needed, should be adopted at the next code cycle.

Thank you for your consideration.

The CalCERTS Team



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